

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

IN RE:

JAMES JAN MORRISON  
SSAN: XXX-XX-6191

Case No. 16-31644-DHW  
Chapter 13

Debtor(s)

**TRUSTEE'S OBJECTION TO CONFIRMATION**

COMES NOW, the Trustee, by and through the undersigned counsel, and pursuant to 11 U.S.C. §1325 objects to confirmation of the debtor(s)' plan as filed. As grounds for said objection, the Trustee states as follows:

1. The debtor(s) filed a petition seeking relief under Chapter 13 of the United States Bankruptcy Code on June 24, 2016.
2. The debtor(s) §341 Meeting of Creditors was held August 11, 2016.

(X) The debtors' plan fails to meet the best interest of creditors test as discussed at the 341 .

(X) Debtor(s) made a preference payment of \$2,000.00 to family members prior to filing. The plan provides a 1% distribution for the benefit of unsecured creditors..

(X) The plan fails to commit non-exempt lawsuit proceeds..

WHEREFORE, the above premises considered, Trustee objects to confirmation of the debtors' plan and requests that either confirmation be denied or the case be continued until such time as the above referenced issues have been resolved.

Respectfully submitted this September 02, 2016.

Office of the Chapter 13 Trustee  
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Sabrina L. McKinney  
Acting Chapter 13 Trustee

By: /s/ Tina J. Hayes

Tina J. Hayes

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I have served copies of the foregoing Trustee's Objection to Confirmation on the parties listed below by either electronic mail or by placing same in the U.S. Mail, postage prepaid and properly addressed this September 02, 2016.

Copy to: DEBTOR(S)  
RICHARD D SHINBAUM

*/s/ Tina J. Hayes*  
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Tina J. Hayes